THE SHERWIN-WILLIAMS COMPANY
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September 14, 2010

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to EPA Comments dated August 10, 2010
EPA and NJDEP review of the May 5, 2010 "*U.S. Avenue Burn Site and Associated Reaches of Honey Run and White Sand Branch – Evaluation of Investigation Results and Proposal to Complete Soil and Sediment Delineation*"
Sherwin-Williams Sites, Gibbsboro, New Jersey
*Administrative Order Index No. II CERCLA-02-99-2035*

Dear Mr. Klimcsak:

The Sherwin-Williams Company (Sherwin-Williams) has received and reviewed the United States Environmental Protection Agency (EPA) August 10, 2010 comments on the May 5, 2010 "*U.S. Avenue Burn Site and Associated Reaches of Honey Run and White Sand Branch – Evaluation of Investigation Results and Proposal to Complete Soil and Sediment Delineation*", and has prepared the following response. As previously discussed and agreed upon, Sherwin-Williams is providing this Response to Comments and revised Figure 12, "Burn Site Proposed Sample Location Map" (attached), and not a complete revised data evaluation report. Therefore, the EPA comments on the text of the May 5, 2010 report will be addressed when a subsequent data report incorporating this phase of sampling is submitted.

For ease of review, the EPA comments are presented in italics, followed by the response.

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**Specific Comments on the May 5, 2010 Text**

1. ***Evaluation of Sediment Results*** *- Page 6, second full paragraph, it is stated that, "At the most upstream locations in both White Sand Branch and Honey Run, concentrations of constituents in sediment are significantly lower and frequently achieve their respective Ecological Screening Criteria." Please revise this statement to reflect that this discussion applies specifically to White Sand Branch downstream of Berlin Road, as upstream locations could imply those within the Vacant Lot and the Route 561 Dump Site. Note, out of the 16 locations from which sediment samples were collected along White Sand Branch, 10 of them contained lead results which were qualified as rejected ("R") at the bottom most interval, and 4 separate locations were not delineated vertically. This results in a limited data set to support*

*the delineation of the vertical extent of sediment contamination. Additional sampling requested by EPA is discussed in detail later.*

Response: The language will be revised in a subsequent data evaluation report to be specific to the portion of White Sand Branch between Berlin Road and U.S. Avenue. As discussed in the response to subsequent comments, Sherwin-Williams will collect additional sediment samples in an effort to obtain results in locations where previous analytical results were rejected for lead.

2. ***Evaluation of Sediment Results*** *- Page 6, first bullet, sediment samples WSDD0007 and WSDD0029 should be included in the discussion of rejected lead data. At both locations, vertical delineation is incomplete since lead data in the deepest interval sampled (3.5 - 4.0 feet and 2.5 - 3.0 feet, respectively) were rejected, and next shallower interval (1.5 - 2.0 feet) had concentrations of Pb 100 times the screening criterion.*

Response: The comment is noted. As discussed in the response to comments on the proposed sediment sampling, Sherwin-Williams will return to these locations, as requested by the EPA, and collect additional sediment samples.

3. ***Evaluation of Soil Results*** *(Area 3) Page 10, middle paragraph - The correct direction is southwest, not southeast in reference to Honey Run.*

Response: The comment is correct.

4. ***Evaluation of Soil Results*** *(Area 4), Page 11 - It is stated that no constituents were found in any sample at a concentration greater than the Residential Direct Contact Soil Remediation Standards (RDCSRS); however arsenic exceeded the RDCSRS in three samples: HRSB0017, HRSB0020, and HRSB0026.*

Response: The comment is correct. The three locations are, however, vertically and horizontally delineated, and therefore no additional sampling is proposed for these locations.

5. ***Figures*** *- Please label White Sand Branch and Honey Run on all figures.*

Response: White Sand Branch and Honey Run are labeled on the revised Figure 12, attached. White Sand Branch and Honey Run will also be labeled on future figures.

6. ***Figures*** *- Please provide a symbol in the legend for the fenced-in portion of the site.*

Response: The legend on the revised Figure 12 now includes a symbol for the external and secondary fencing. Future figures will also include the symbol on the legend.

7. ***Figures*** *- Please describe the secondary fence area (the former burn area) earlier in the document (it is currently mentioned on page 7).*

Response: Future documents for the Burn Site will discuss the secondary fence area in introductory portions of the document.

8. ***Figures*** *– Figures 7-10 cite that the "green symbol" only represents a sediment sample (as opposed to both soil and sediment samples are compared to the NJDEP soil criteria) with no exceedances present, whereas both soil and sediment samples are presented.*

Response: Figures 7-10 will be revised to state that the symbol represents a soil sample, and not a sediment sample.

9. ***Tables*** *– Table 4 presents the "average" (taken from 3 distinct XRF readings) arsenic and lead results collected during field sampling activities, however, this is not noted on the table. Please include a note that this is indeed the case and the 3 individual readings can be found in the daily notes from the date which the samples were collected.*

Response: Future tables presenting XRF results will include a footnote stating that the value presented is an average, and the individual readings can be found in the daily field notes.

**General Comment on soil and sediment sample analysis**

*In instances where the proposed sampling is for lead only, or lead and arsenic only; samples should be analyzed at the laboratory according to EPA Contract Laboratory Program Statement of Work for Multi-Media, Multi-Concentration Inorganic Analytical Service for Superfund (ILM05.4), (CLP SOW ILM05.4). Separate analysis for cyanide is not necessary.*

Response: All samples collected will be analyzed for TAL Metals.

**Sherwin-Williams Proposed and EPA's Requested Sediment Sampling (Comments)**

1. *WSDD0033, 35, 36, and 37 – EPA agrees that samples should be collected at the depths proposed. In addition to the sediment sample locations mentioned, EPA is also requesting that vertical delineation be performed at the following White Sand Branch sediment sample locations, from depths 1 foot (bottom 6 inches of a 1 foot core) below the last sample interval where there was either an exceedance of the Ecological Screening Criteria (ESC) of lead (or at times arsenic), or where lead data was qualified as rejected ("R"). WSDD0029 – lead data is qualified as "R" (collect 2.5 – 3.0 ft); WSDD0007 and WSDD0009 - lead data is qualified as "R" (collect 2.5 – 3.0 ft for both); and WSDD0011 – lead data is qualified as "R" (collect 2.5 – 3.0 ft).*

Response: WSDD0007, WSDD0009, WSDD0011 and WSDD0029 will be included in the supplemental sediment sampling, as shown on the revised Figure 12. At all locations, sampling will begin at the interval specified in the EPA comment.

2. *HRDD0009 – EPA agrees with sampling proposal. In addition, EPA is also requesting that a sample from the 2.5 - 3.0 ft. interval be collected at HRDD0005 (where neither sample HRDD0005, nor HRDD0004 along this transect were delineated).*

Response: HRDD0005 will be included in the supplemental sediment sampling, as shown on the revised Figure 12. Sampling will begin at the 2.5 - 3.0 ft. interval.

3. *Upstream of HRDD0012 – EPA agrees with the sampling proposal as presented.*

Response: Comment noted.

4. *EPA is requesting that a sample be collected from the 2.5 - 3.0 ft. interval at sample location HRDD0002.*

Response: HRDD0002 will be included in the supplemental sediment sampling, as shown on revised Figure 12. Sample collection will begin at the 2.5 - 3.0 ft. interval.

At all locations, the sample collected from the shallowest interval will be screened with the XRF. If neither arsenic nor lead is found at a level greater than the RDCSRS, no additional samples will be collected. If arsenic or lead is found at a concentration greater than the RDCSRS, a sample will be collected from the bottom six inches of the next one-foot interval and will be screened with the XRF. This will continue until neither arsenic nor lead is found at a level greater than the RDCSRS. All samples will be collected and analyzed for TAL Metals.

**Sherwin-Williams Proposed and EPA's Requested Soil Sampling (Comments)**

1. *Former sample locations BSSB0061, BSSB0062, and WSSB0042 (Area 1) – EPA agrees with sampling proposal.*

Response: Comment noted.

2. *Northwest of WSSB0059 (Area 2) – EPA agrees with sampling proposal.*

Response: Comment noted.

3. *Northeast of WSSB0061 (Area 2) – EPA agrees with sampling proposal.*

Response: Comment noted.

4. *Between WST 5 and WST 6 (Area 2) – EPA agrees with sampling proposal. Figures should be amended to reflect that both the north and south side of the proposed transect will be sampled.*

Response: Figure 12 has been revised to show that samples will be collected from both the north and south sides of the transect.

5. *North of location BSSB0015 (Area 3) – EPA agrees with the approach.*

Response: Comment noted.

6. *Southeast of location BSSB0020 (Area 3) – EPA agrees with the proposal.*

Response: Comment noted.

7. *The following soil sample locations had greater than a 4 ft. interval (often times, much greater than 4 ft) between a sample with an exceedance and a sample with a concentration for lead and/or arsenic below the RDCSRS: BSSB0007, BSSB0008, BSSB0009, BSSB0015, BSSB0020, and BSSB0025. EPA is requesting that a six inch sample be collected from the bottom of a 2 ft. core (to be analyzed for TAL metals), as well as an XRF sample. XRF and sampling should continue until the depth to which the interval was last sampled and results indicated no exceedances for metals compound above the RDCSRS.*

Response: Sherwin-Williams will return to locations BSSB0007, BSSB0008, BSSB0009 and BSSB0025 to collect additional samples to determine whether vertical delineation is achieved at depths shallower than those at which vertical delineation is currently achieved.

As we have previously discussed, EPA is no longer requiring sampling at BSSB0015 and BSSB0020. There are only two intermediate intervals (3.5 - 4.0 ft. and 7.5 - 8.0 ft.) at BSSB0015 where additional samples would be collected. Additional sampling may be proposed in the future for purposes of selecting and/or determining the extent of a remedy. At this time, however, Sherwin-Williams is comfortable, for purposes of the RI, in assuming that the intervals between 2.0 ft. and 11.0 ft. contain one or more constituents at a level greater than the RDCSRS.

Similarly, there is only one interval (9.0 - 9.5 ft.) at BSSB0020 where an additional sample would be collected. Sherwin-Williams is comfortable at this time in assuming that the interval between 7.5 ft. and 11.5 ft. contains one or more constituents at a level greater than the RDCSRS.

At locations BSSB0007, BSSB0008, BSSB0009 and BSSB0025, we are proposing to collect soil samples at predetermined intervals and have those samples analyzed for TAL Metals. The depths of the upper intervals containing one or more constituents at levels above the RDCSRS are known, as are the lower clean intervals. Therefore, there is no need to use the XRF to guide additional sample collection. As has been seen

from observing field procedures, the XRF screening is a relatively time consuming process, so by predetermining the sampling intervals, we will be able to expedite sample collection. We propose to begin collecting samples at the next 2-foot interval below the deepest sample containing one or more constituents at a level greater than the RDCSRS and terminate at the 2-foot interval above the lower clean sample.

8. *Samples BSSB0011 and BSSB0013 both have intervals greater than 2 ft. separating them from the next sample result that contains no exceedances. In fact, sample BSSB0011, has a laboratory sample with exceedances, straddled by two samples (2 ft. above and 2 ft. below) ran on the XRF that had exceedances for lead. EPA is requesting that sample BSSB0011 be delineated above and below the 5.5 ft interval, whereas BSSB0013 requires sampling below the 4.0 ft interval.*

Response: As has been discussed, EPA is no longer requiring the sampling at BSSB0011 and BSSB0013. At location BSSB0011, the sample from the 1.5 - 2.0 ft. and 9.0 - 9.5 ft. intervals contained no constituents above criteria. In between, the sample from the 5.0 - 5.5 ft. interval contained arsenic and lead at levels above criteria, and XRF results from both the 3.0 - 3.5 ft. and 7.0 - 7.5 ft. intervals were above criteria. Based on these results, it can be concluded that the interval between 2.0 ft. and 9.0 ft. contains one or more constituents at a levels greater than the RDCSRS. At location BSSB0013, the 1.5 - 2.0 ft. and 6.0 - 6.5 ft. intervals contain no constituents above criteria while the 3.5 - 4.0 ft. interval does. The intervals between these samples are 1.5 feet and 2.0 feet, which is consistent with the sampling protocol used at the majority of soil sampling locations across the site. Depending on the remedies evaluated in the FS and the remedy selected, there may be a need to collect additional data at a future date.

9. *Sample BSSB0001 had an exceedance for lead (1130 ppm) at 2.5 ft. and had another exceedance for lead (427) which was rejected at 4.0 ft. EPA is requesting that this interval be resampled for TAL metals.*

Response: BSSB0001 has been included in the supplemental soil sampling, as shown on the revised Figure 12. The sample requested by EPA will be collected and analyzed for TAL Metals.

10. *Soil samples HRSB0004 and WSSB0012 both require vertical delineation for TAL metals. At the current time, EPA is not requesting that soil sample BSSB0012 be delineated. However, EPA is requesting that a soil sample be collected at 25 ft. away from HRSB0004 for TAL metals and SVOC analysis. If contaminants are present at 25 ft. away from this new point, then another sample should be placed 50 ft away for the same analytical parameters.*

Response: HRSB0004, WSSB0012, and a 25-foot step-out location from HRSB0004 will be included in the supplemental soil sampling, as shown on revised Figure 12. At HRSB0004 and WSSB0012, the first sample will be collected from a depth interval two feet below the deepest interval already sampled. The initial sample interval for the step-out location will be from 0.0 - 0.5 ft.

At all locations, the initial sample will be field screened with the XRF. If neither arsenic nor lead is found at a concentration greater than the RDCSRS, the sample will be collected and analyzed for TAL Metals plus cyanide and SVOCs. If arsenic or lead is found at a concentration greater than the RDCSRS, another sample will be collected from the bottom six inches of the next two-foot interval. This sample will be field screened with the XRF. This will continue until the XRF finds neither arsenic nor lead at a level greater than the RDCSRS.

The depth at which vertical delineation will be achieved at these locations cannot be predicted with any degree of accuracy. Based on the depths at which vertical delineation has been achieved in other locations within the Burn Site, it is possible that sampling could continue to depths greater than 10 to 15 feet. Therefore, the following sample collection and analysis protocol will be used:

- The first interval from each location will be collected for laboratory analysis.
- The sample from the 2.0 - 2.5 ft. interval will be collected for laboratory analysis at the 25-foot step-out location from HRSB0004.
- The bottom sample, where the XRF finds neither arsenic nor lead at a concentration greater than the RDCSRS, will be collected at each location.
- If XRF analysis determines that delineation for arsenic and lead is achieved at an interval shallower than 4.0 - 4.5 ft., samples from all intervals will be collected for laboratory analysis.
- If XRF analysis determines that delineation for arsenic and lead is achieved at 6.0 - 6.5 ft. or deeper, samples will be collected for laboratory analysis from every other 2-foot interval beginning at either the 2.0 - 2.5 ft. interval at the 25-foot step-out location for HRSB0004, or the first interval at which the sample is collected at HRSB0004 and WSSB0012.

This approach will ensure that a vertical profile of constituent concentrations is obtained in each location. For borings at which the XRF analysis determines that vertical delineation for arsenic and lead is achieved at a relatively shallow depth, all samples will be collected and analyzed for TAL Metals plus cyanide and SVOCs. If the XRF finds that vertical delineation for arsenic and lead is achieved at greater depths, there will be a full vertical profile of XRF results, and laboratory analytical results will be obtained at least every four feet.

11. *Request for sampling of material under the mossy areas (i.e., east and in the vicinity of monitoring well #10) – EPA is requesting that the material present beneath the mossy areas be sampled. EPA is requesting that up to 3 locations be sampled, and that the locations will be selected by the EPA Remedial Project Manager (RPM). Samples shall be analyzed for TAL metals (no cyanide) and for SVOCs. On a recent site visit by the RPM on July 22, 2010, RPM noticed that this "material" varied in depth. In addition to the material (resembling an ash-like material) present, there*

*were also various instances of "stained material" and/or product. Pictures of this material were photographed by the RPM and provided to Weston (electronically, via an e-mail). Up to two samples may be requested per location.*

Response: Sherwin-Williams and the EPA project manager will jointly identify locations for sampling during a site walk to be scheduled.

12. *Sample analysis of discolored (hard) material. During several site visits, EPA staff noted the frequent presence of material (appears to be dried paint sludge) in various sizes at the surface of portions of the Burn Site. EPA is requesting that this material be tested. It may require that the material requires crushing (prior to analysis). Analysis should include both TAL metals and SVOCs.*

Response: Sherwin-Williams and the EPA project manager will jointly identify locations for sampling during a site walk to be scheduled.

Based on previous discussions with you, the EPA and Sherwin-Williams are in agreement on the scope of the additional soil and sediment sampling for the Burn Site. Therefore, Sherwin-Williams is proceeding with previously-scheduled sampling activities at the site. It is anticipated that it will require three to four weeks to complete the sampling. At your convenience, Sherwin-Williams representatives will meet with you to jointly identify the sampling locations to address comments 11 and 12, above.

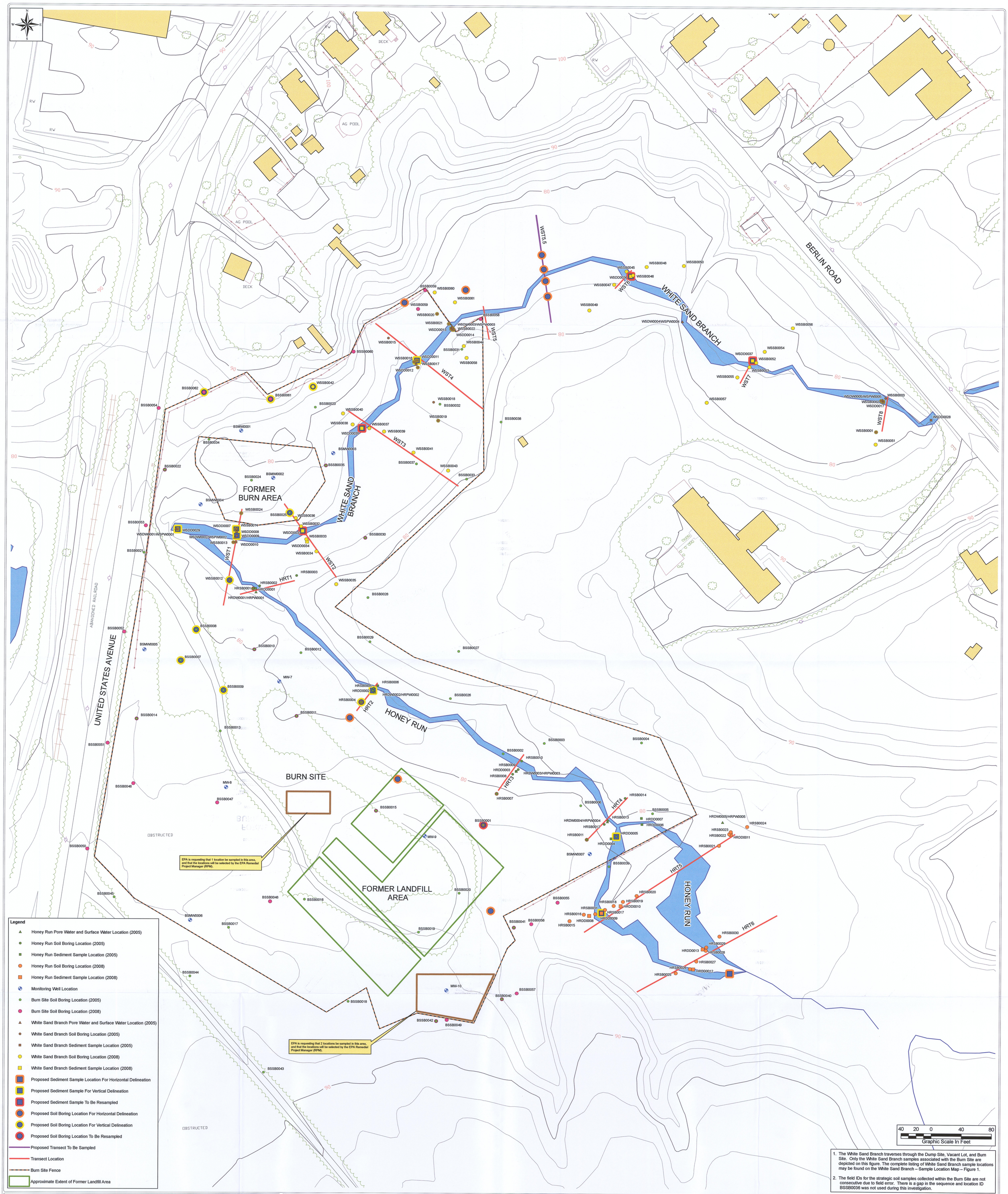
Should you have any other recommendations or if you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,

Mary Lou Capichioni

Mary Lou Capichioni
Director Remediation Services

Attachment
cc: J. Josephson, EPA (New York)
W. Sy, EPA (Edison)
L. Vogel, NJDEP (4 copies)
P. Parvis, HDR
J. Gerulis, Sherwin-Williams (w/o enclosures)
A. Danzig, Sherwin-Williams (w/o enclosures)
S. Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione (w/o enclosures)
H. Martin, ELM
R. Mattuck, Gradient
S. Jones, Weston Solutions
S. Clough, Weston Solutions
A. Fischer, Weston Solutions




1. The White Sand Branch traverses through the Dump Site, Vacant Lot, and Burn Site. Only the White Sand Branch samples associated with the Burn Site are depicted on this figure. The complete listing of White Sand Branch sample locations may be found on the White Sand Branch – Sample Location Map – Figure 1.
2. The field IDs for the strategic soil samples collected within the Burn Site are not consecutive due to field error. There is a gap in the sequence and location ID BSSB0036 was not used during this investigation.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| REPORT DATE: September 2010 | PROJECT MANAGER: S. Jones |
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| CLIENT NAME: The Sherwin-Williams Company | |
| PROJECT NAME: Sherwin-Williams Remedial Investigation | |
| DRAWING TITLE: BURN SITE PROPOSED SAMPLE LOCATION MAP | |
| FIGURE: 12 | SCALE: 1" = 40' |
| DATE: 09/13/2010 | |